

1 **UNITED STATES DISTRICT COURT**  
2 **NORTHERN DISTRICT OF CALIFORNIA**  
3 **SAN FRANCISCO DIVISION**  
4

5 IN RE: UBER TECHNOLOGIES, INC.,  
6 PASSENGER SEXUAL ASSAULT  
7 LITIGATION,

8 This Document Relates to:

9 *Jaylynn Dean v. Uber Technologies, Inc., et*  
10 *al.*, No. 3:23-cv-06708  
11

Case No. 3:23-md-03084-CRB

**DECLARATION OF LAURA VARTAIN  
HORN IN SUPPORT OF  
DEFENDANTS' MOTION TO STRIKE  
UNDISCLOSED EXPERT OPINIONS**

Judge: Hon. Charles R. Breyer  
Courtroom: Courtroom 6 – 17th Floor

Trial Date: January 13, 2026

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13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF ARIZONA**  
15 **PHOENIX DIVISION**  
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17 JAYLYNN DEAN,  
18 Plaintiff,  
19 v. UBER TECHNOLOGIES, INC., et al.,  
20 Defendants  
21

CASE NO. 25-cv-4276-PHX-CRB

Judge: Hon. Charles R. Breyer  
Courtroom: 501

**DECLARATION OF LAURA VARTAIN HORN**

I, Laura Vartain Horn, declare as follows:

1. I am an attorney at law and duly licensed to practice before the U.S. District Court for the Northern District of California, and am admitted to practice *pro hac vice* before this Court in the U.S. District Court of Arizona. I am a partner at the law firm of Kirkland & Ellis LLP and an attorney of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I have personal knowledge of the facts set forth in this Declaration and, if called to testify as a witness, could and would do so under oath.

2. I submit this declaration in support of Defendants’ Motion to Strike Dr. Minette Drumwright’s Undisclosed Expert Opinions in *Jaylynn Dean v. Uber Technologies Inc., et al.*, N.D. Cal. No. 23-md-03084; D. Ariz. No. 25-cv-4276.

3. Attached to this Declaration as **Exhibit A** is a true and correct copy of the January 12, 2026, Corrected Supplemental Materials Considered List of Dr. Minette E. Drumwright.

4. Attached to this Declaration as **Exhibit B** is a true and correct copy of Trial Exhibit P-00176, identified as bates number UBER\_JCCP\_MDL\_003405397.

5. Attached to this Declaration as **Exhibit C** is a true and correct copy of Trial Exhibit P-01572, identified as bates number UBER\_JCCP\_MDL\_000157415.

6. Attached to this Declaration as **Exhibit D** is a true and correct copy of Trial Exhibit P-04506, identified as bates number UBER\_JCCP\_MDL\_004806867.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 15, 2026.

/s/ Laura Vartain Horn  
Laura Vartain Horn